

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re,
BENJAMIN KLEIN,
PO Box 747
Monsey, NY 10952
SSN xxx-xx-7215

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Benjamin Klein,

Case No. 18-23417 RDD

Chapter 13

Plaintiff(s),

vs.

Adversary No. 19-08200 RDD

Moshe Leib (Moses) Witrol, Yitzchok Dov (Isaac, George)
Fisch, Rabbi Gabriel Stern, Zalman Dov Klein, Malky Fisch,
Dina Klein, Aryeh Gutman, Schlomo Gutman, Aron Eagle,
Jacob (Yossi) Eagle, Esther Klein, Avraham Lehrer, (& upon
Leave granted) Joseph Maria, and Does 1-100,

Defendant(s).

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NOTICE OF MOTION

NOTICE IS HEREBY GIVEN that upon the accompanying Memorandum of Law dated February 26, 2019, the Declaration of Joseph Churgin, Esq., dated February 26, 2019, and all exhibits attached thereto, Defendants Zalman Dov Klein and Dina Klein, by and through their attorneys, SAVAD CHURGIN, move this Court, before Hon. Robert D. Drain, USDJ, at the United States Courthouse, located at 300 Quarropas Street, White Plains, New York 10601, on March 13, 2019 at 10:00 a.m. for an Order denying Plaintiff's request for a Certificate of Default and/or granting Responding Defendants an extension of time to answer the Complaint.

PLEASE TAKE FURTHER NOTICE that responsive briefs and papers will be served pursuant to the Federal Rules of Civil Procedure and the Local Rules of this Court.

Dated: Nanuet, New York
February 26, 2019

SAVAD CHURGIN LLP



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